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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ORACLE USA, INC., a Colorado corporation;
ORACLE AMERICA, INC., a Delaware
corporation; and ORACLE INTERNATIONAL
CORPORATION, a California corporation,

Plaintiffs,

v.

RIMINI STREET, INC., a Nevada corporation;
SETH RAVIN, an individual,

Defendants.

Case No 2:10-cv-0106-LRH-PAL

**DECLARATION OF BREE HANN IN
SUPPORT OF ORACLE'S MOTION
FOR PARTIAL SUMMARY
JUDGMENT**

1 I, Bree Hann, declare as follows:

2 1. I am an attorney at Bingham McCutchen, counsel of record in this action for
3 Plaintiffs Oracle USA, Inc., Oracle America, Inc., and Oracle International Corp. (collectively,
4 “Oracle”). I have personal knowledge of the facts set forth in this declaration and would
5 competently testify to them if called upon to do so.

6 2. The Exhibits referenced below are all attached to the Appendix of Exhibits Cited
7 In Support Of Oracle’s Motion For Partial Summary Judgment. These Exhibits are all true and
8 correct copies of pages or excerpts from final deposition and hearing transcripts, or from exhibits
9 used in depositions, or from documents produced by the parties or a third party, or from written
10 discovery to or from Defendant Rimini Street, Inc. (“Rimini”). To minimize bulk, for ease of
11 use, and to the extent possible without losing context, only the relevant pages and information
12 are included in these Exhibits. We have provided highlighting and/or boxing where possible to
13 further assist in identifying the information relevant to Oracle’s motion.

14 3. Attached to the Appendix as Exhibit 18 is a true and correct copy of Defendant
15 Rimini Street’s (“Rimini’s”) Supplemental Responses to Oracle’s Interrogatories 7, 15, 28, 29,
16 and 30.

17 4. Attached to the Appendix as Exhibit 19 is a true and correct copy of Supplemental
18 Exhibit A to Rimini’s Supplemental Response to Interrogatory 15.

19 5. Attached to the Appendix as Exhibit 20 is a true and correct copy of Supplemental
20 Exhibit B to Rimini’s Supplemental Response to Interrogatory 15.

21 6. Attached to the Appendix as Exhibit 21 is a true and correct copy of Supplemental
22 Exhibit C to Rimini’s Supplemental Response to Interrogatory 15.

23 7. Attached to the Appendix as Exhibit 22 is a true and correct copy of Oracle’s
24 Fifth Set of Interrogatories 20-25.

25 8. Attached to the Appendix as Exhibit 23 is a true and correct copy of Exhibit A to
26 Oracle’s Fifth Set of Interrogatories 20-25.

27 9. Attached to the Appendix as Exhibit 24 is a true and correct copy of Rimini’s
28 Third Supplemental Response to Interrogatories 20-22.

1 10. Attached to the Appendix as Exhibit 25 is a true and correct copy of a
2 communication from Rimini enclosing the First Supplemented Exhibit 1A-3 to Rimini's Third
3 Supplemental Response to Interrogatories 20-22.

4 11. Attached to the Appendix as Exhibit 26 is a true and correct copy of Exhibit 1B-2
5 to Rimini's Third Supplemental Response to Interrogatories 20-22.

6 12. Attached to the Appendix as Exhibit 27 is a true and correct copy of Exhibit 1C-3
7 to Rimini's Third Supplemental Response to Interrogatories 20-22.

8 13. Attached to the Appendix as Exhibit 28 is a true and correct copy of Exhibit 5 to
9 Rimini's Third Supplemental Response to Interrogatories 20-22.

10 14. Attached to the Appendix as Exhibit 29 is a true and correct copy of Rimini's
11 Second Supplemental Responses to Interrogatories 24-25.

12 15. Attached to the Appendix as Exhibit 30 is a true and correct copy of Oracle's First
13 Set of Requests for Admission.

14 16. Attached to the Appendix as Exhibit 31 is a true and correct copy of Rimini's
15 Responses to Oracle's First Set of Requests for Admission.

16 17. Attached to the Appendix as Exhibit 32 is a true and correct copy of relevant
17 excerpts of Oracle's Third Set of Requests for Admission.

18 18. Attached to the Appendix as Exhibit 33 is a true and correct copy of Rimini's
19 Second Amended Responses to Oracle's Third Set of Requests for Admission.

20 19. Attached to the Appendix as Exhibit 34 is a true and correct copy of Oracle's
21 Second Amended Requests for Admission 239-240.

22 20. Attached to the Appendix as Exhibit 35 is a true and correct copy of Rimini's
23 Responses to Oracle's Second Amended Requests for Admission 239-240.

24 21. Attached to the Appendix as Exhibit 36 is a true and correct copy of relevant
25 excerpts of the transcript of the October 18, 2011 deposition of Jeff Allen.

26 22. Attached to the Appendix as Exhibit 37 is a true and correct copy of Oracle
27 Deposition Exhibit 568, which was introduced during the October 18, 2011 deposition of Jeff
28 Allen.

23. Attached to the Appendix as Exhibit 38 is a true and correct copy of Oracle's Deposition Exhibit 570, which was introduced during the October 18, 2011 deposition of Jeff Allen.

24. Attached to the Appendix as Exhibit 39 is a true and correct copy of Oracle's Deposition Exhibit 312, which was introduced during the September 1, 2011 deposition of Timothy Conley.

25. Attached to the Appendix as Exhibit 40 is a true and correct copy of relevant excerpts of the transcript of the May 10, 2011 deposition of Douglas Baron.

26. Attached to the Appendix as Exhibit 41 is a true and correct copy of relevant excerpts of the transcript of the June 24, 2011 deposition of Dennis Chiu.

27. Attached to the Appendix as Exhibit 42 is a true and correct copy of relevant excerpts of the transcript of the September 1, 2011 deposition of Timothy Conley.

28. Attached to the Appendix as Exhibit 43 is a true and correct copy of relevant excerpts of the transcript of the March 15, 2011 deposition of J.R. Corpuz.

29. Attached to the Appendix as Exhibit 44 is a true and correct copy of a document Rimini produced to Oracle as part of discovery in this action. As reflected on the bottom right-hand side of each page of the document, the document is Bates-numbered RSI00479793-94.

30. Attached to the Appendix as Exhibit 45 is a true and correct copy of Oracle Deposition Exhibit 33, which was introduced during the March 15, 2011 deposition of J.R. Corpuz.

31. Attached to the Appendix as Exhibit 46 is a true and correct copy of Oracle Deposition Exhibit 34, which was introduced during the March 15, 2011 deposition of J.R. Corpuz.

32. Attached to the Appendix as Exhibit 47 is a true and correct copy of relevant excerpts of the transcript of the June 8, 2011 deposition of Ray Grigsby.

33. Attached to the Appendix as Exhibit 48 is a true and correct copy of relevant excerpts of the transcript of the December 16, 2011 deposition of Alecia Holmes.

34. Attached to the Appendix as Exhibit 49 is a true and correct copy of relevant

1 excerpts of the transcript of the November 22, 2011 deposition of Nambirajan Lakshmanan.

2 35. Attached to the Appendix as Exhibit 50 is a true and correct copy of relevant
3 excerpts of the transcript of the March 17, 2011 deposition of Beth Lester.

4 36. Attached to the Appendix as Exhibit 51 is a true and correct copy of relevant
5 excerpts of a technical .DAT file Rimini produced to Oracle as part of discovery in this action.
6 As reflected on the upper left-hand side of each page of the document, the document from which
7 Exhibit 51 was excerpted is Bates-numbered RSI00919586.

8 37. Attached to the Appendix as Exhibit 52 is a true and correct copy of relevant
9 excerpts of a technical .DAT file Rimini produced to Oracle as part of discovery in this action.
10 As reflected on the upper left-hand side of each page of the document, the document from which
11 Exhibit 52 was excerpted is Bates-numbered RSI00910434.

12 38. Attached to the Appendix as Exhibit 53 is a true and correct copy of relevant
13 excerpts of a technical .DAT file Rimini produced to Oracle as part of discovery in this action.
14 As reflected on the upper left-hand side of each page of the document, the document from which
15 Exhibit 52 was excerpted is Bates-numbered RSI00910434.

16 39. Attached to the Appendix as Exhibit 54 is a true and correct copy of relevant
17 excerpts of the transcript of the November 11, 2011 deposition of George Lester.

18 40. Attached to the Appendix as Exhibit 55 is a true and correct copy of Oracle
19 Deposition Exhibit 809, which was introduced during the November 11, 2011 deposition of
20 George Lester.

21 41. Attached to the Appendix as Exhibit 56 is a true and correct copy of relevant
22 excerpts of the transcript of the September 7, 2011 deposition of David Radtke.

23 42. Attached to the Appendix as Exhibit 57 is a true and correct copy of relevant
24 excerpts of the transcript of the November 17, 2011 deposition of Seth Ravin.

25 43. Attached to the Appendix as Exhibit 58 is a true and correct copy of relevant
26 excerpts of the transcript of the December 16, 2011 deposition of Brian Slepko.

27 44. Attached to the Appendix as Exhibit 59 is a true and correct copy of relevant
28 excerpts of the transcript of the April 27, 2011 deposition of Susan Tahtaras.

45. Attached to the Appendix as Exhibit 60 is a true and correct copy of Oracle Deposition Exhibit 112, which was introduced during the April 27, 2011 deposition of Susan Tahtaras.

46. Attached to the Appendix as Exhibit 61 is a true and correct copy of relevant excerpts of the transcript of the September 27, 2011 deposition of John Whittenbarger.

47. Attached to the Appendix as Exhibit 62 is a true and correct copy of relevant excerpts of the transcript of October 5, 2011 deposition of Krista Williams.

48. Attached to the Appendix as Exhibit 63 is a true and correct copy of relevant excerpts of the transcript of the Status Conference held in this action on November 8, 2011 (Dkt. No. 194).

49. Attached to the Appendix as Exhibit 64 is a true and correct copy of Oracle Deposition Exhibit 38, which was introduced during the March 15, 2011 deposition of J.R. Corpuz.

50. Attached to the Appendix as Exhibit 65 is a true and correct copy of Oracle Deposition Exhibit 483, which was introduced during the October 5, 2011 deposition of Krista Williams.

51. Attached to the Appendix as Exhibit 66 is a true and correct copy of Oracle Deposition Exhibit 480, which was introduced during the October 5, 2011 deposition of Krista Williams.

52. Attached to the Appendix as Exhibit 67 is a true and correct copy of Second Amended Exhibit B to Oracle's Second Amended Requests for Admission 239-240

53. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct and that this declaration is executed at San Francisco, California, on March 30, 2012.

/s/ Bree Hann
Bree Hann